

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LONE STAR AMERICAS ACQUISITIONS, INC. :
and LSRMF3 AQ HOLDINGS TRUST, :

Civil Action No.: 22-cv-08852-JGK

Plaintiffs, :

vs. :

SUSA FINANCIAL, INC. d/b/a FIRSTFUNDING, :
INC., :

Defendant. :


NOTICE OF MOTION

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PLEASE TAKE NOTICE that upon the annexed Declaration of Scott R. Matthews, Esq., dated November 15, 2022, and the exhibits annexed thereto; the annexed Declaration of Rebecca Smith, dated November 15, 2022, and the exhibits annexed thereto; and the accompanying Memorandum of Law, dated November 15, 2022, and all prior pleadings and proceedings had herein, plaintiffs Lone Star Americas Acquisitions, Inc. (“Lone Star”) and LSRMF3 AQ Holdings Trust (“Trust”) (collectively, the “Plaintiffs”), by their attorneys, Windels Marx Lane & Mittendorf, LLP, will move this Court, before the Honorable John G. Koeltl, U.S.D.J., at the United States Courthouse, 500 Pearl Street, New York, New York, on a date and time as determined by the Court, for an order (1) pursuant to 28 U.S.C § 1447, remanding this action to the Supreme Court of the State of New York, County of New York, and (2) granting Plaintiffs such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 6.1(b), any opposing affidavits and answering memoranda shall be served within fourteen days after service of these moving papers.

Dated: New York, New York
November 15, 2022

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